

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

IN RE NATIONAL PRESCRIPTION OPIATE  
LITIGATION

This document relates to:  
*Track One Cases*

MDL No. 2804

Case No. 17-md-2804

Hon. Dan Aaron Polster

**DECLARATION OF STEVEN A. REED**

Pursuant to 28 U.S.C. § 1746, I, Steven A. Reed, hereby declare as follows:

1. I am a partner in the Philadelphia, Pennsylvania office of Morgan, Lewis & Bockius LLP, counsel for Defendants Watson Laboratories, Inc., Actavis LLC, Actavis Pharma, Inc. *f/k/a* Watson Pharma, Inc., Warner Chilcott Company, LLC, Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. *f/k/a* Watson Laboratories, Inc.-Salt Lake City, and Actavis Laboratories FL, Inc., *f/k/a* Watson Laboratories, Inc.-Florida (collectively, “Actavis Generic Defendants”), Cephalon, Inc. (“Cephalon”) and Teva Pharmaceuticals USA, Inc. (“Teva USA”) (collectively, “Teva Defendants”) and specially-appearing Defendant Teva Pharmaceutical Industries Ltd.

2. I submit this declaration on behalf of the Teva and Actavis Generic Defendants, in support of the Teva and Actavis Generic Defendants’ Motion for Summary Judgment for the purpose of transmitting to the Court true and correct copies of the documents attached hereto.

3. Attached as Appendix A is a chart of publications cited by Plaintiffs, all of which fail to create a material issue of fact sufficient to overcome summary judgment.

4. Attached as Exhibit 1 is a true and correct copy of excerpts of Responses of Valli Baldassano, former Chief Compliance Officer of Cephalon, to Plaintiffs' Deposition by Written Questions.

5. Attached as Exhibit 2 is a true and correct copy of the Institute of Medicine Report titled "Relieving Pain in America, A Blueprint for Transforming Prevention, Care, Education, and Research" (2011).

6. Attached as Exhibit 3 is a true and correct copy of an article by Dr. David Fishbain, *et al.* titled "What Percentage of Chronic Nonmalignant Pain Patients Exposed to Chronic Opioid Analgesic Therapy Develop Abuse/Addiction and/or Aberrant Drug-Related Behaviors? A Structured Evidence-Based Review", which was produced in the above-captioned case and assigned Bates number MDL\_EXP\_0004455.

7. Attached as Exhibit 4 is a true and correct copy of Cephalon's Unrestricted Educational Grant Agreement to the American Pain Foundation, which was produced in the above-captioned case and assigned Bates number TEVA\_MDL\_A\_03315373.

8. Attached as Exhibit 5 is a true and correct copy of Cephalon Policy on Funding to Support Independent, Third-Party Educational or Scientific Meetings, which was produced in the above-captioned case and assigned Bates number TEVA\_MDL\_A\_11892887

9. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed on this 16th day of August, 2019.

/s/ Steven A. Reed

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